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NICEPEOPLEATWORK, S.L., NPAW, Inc.,
FERRAN GUTIERREZ and SERGI VERGES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CONVIVA, INC.,

Plaintiff,

vs.

NICEPEOPLEATWORK, S.L., NPAW, Inc.,
FERRAN GUTIERREZ and SERGI VERGES

Defendants.

Case No. 3:16-cv-01543-VC

STIPULATION AND ~~PROPOSED~~
ORDER TO RESCHEDULE DATE OF
CASE MANAGEMENT CONFERENCE

CMC Date: June 28, 2016
Proposed CMC Date: August 23, 2016
Time: 1:30 p.m.
Courtroom: 4, 17th Floor
Judge: Hon. Vince Chhabria

1 Pursuant to United States District Court, Northern District of California Local Rules 6-2
2 and 7-12, Plaintiff Conviva, Inc. ("Conviva") and Defendants NicePeopleAtWork, S.L., NPAW,
3 Inc., Ferran Gutierrez, and Sergi Verges (collectively, "the NicePeopleAtWork Defendants")
4 hereby file this Stipulation to reschedule the June 28, 2016 Case Management Conference to
5 August 23, 2016.

6 WHEREAS, on or about May 25, 2016, Defendants consented to waive service of a
7 summons in this action;

8 WHEREAS, no trial date has yet been set in this action;

9 WHEREAS, Defendants are currently required to respond to the Amended Complaint on
10 July 25, 2016.

11 WHEREAS the Court scheduled a Case Management Conference for June 28, 2016 at
12 1:30 PM in Courtroom in Courtroom 4, 17th Floor, San Francisco (Dkt. No. 10);

13 WHEREAS the parties are in the process of discussing potential settlement;

14 WHEREAS the parties expressly agree that the NicePeopleAtWork Defendants do not
15 waive their rights to challenge the exercise of personal jurisdiction over the NicePeopleAtWork
16 Defendants, and do not waive their rights to challenge venue in this Court by entering into this
17 Stipulation;

18 NOW THEREFORE, the parties stipulate and jointly request that the Court reschedule
19 the Case Management Conference scheduled for June 28, 2016 at 1:30 PM to August 23, 2016 at
20 1:30 PM, and continue all other deadlines listed in Dkt. No. 4 accordingly.

1 Dated: June 7, 2016

Respectfully submitted,

2 /s/ Shane Brun

3 Shane Brun

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4 GOODWIN PROCTER LLP

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5 San Francisco, California 94111

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7 Attorneys for Plaintiff CONVIVA, INC.

8
9 Dated: June 7, 2016

Respectfully submitted,

10 /s/ Richard G. Frenkel

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16 Attorneys for Defendants

17 NICEPEOPLEATWORK, S.L., NPAW, Inc.,

18 FERRAN GUTIERREZ and SERGI VERGES

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 8, 2016



THE HONORABLE VINCE CHHABRIA
United States District Court Judge

CERTIFICATE OF SERVICE

I, Shane Brun, hereby certify that on June 7, 2016 a true copy of the foregoing
DECLARATION OF SHANE BRUN IN SUPPORT OF STIPULATION AND [PROPOSED]
ORDER TO RESCHEDULE DATE OF CASE MANAGEMENT CONFERENCE was served by
ECF upon all other counsel of record in this action.

June 7, 2016

/s/Shane Brun
Shane Brun